



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

December 12, 2002

Certified Mail No. 7000 1670 0013 9128 9721

Joe Huff, Plant Manager
The Amalgamated Sugar Co. LLC
P.O. Box 8787
Nampa, ID 83653-8787

RE: AIRS Facility No. 027-00010, The Amalgamated Sugar Co. LLC (TASCO), Nampa
Final Tier I Operating Permit

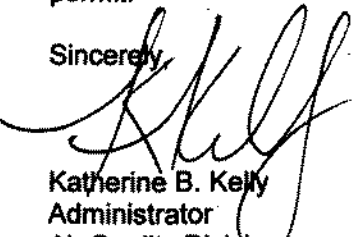
Dear Mr. Huff:

The Department of Environmental Quality (Department) is issuing Tier I Operating Permit No. 027-00010 to TASCO's facility in Nampa, in accordance with IDAPA 58.01.01.300 - 386. The enclosed permit is effective immediately and is based on the information contained in your permit application, received July 3, 1995.

Tom Krinke of the Boise Regional Office will contact you regarding a meeting to discuss the permit terms and requirements. The Department recommends the following representatives attend this meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of the decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Bill Rogers at (208) 373-0502 or wrogers@deq.state.id.us to discuss any questions or concerns you may have with the enclosed permit.

Sincerely,


Katherine B. Kelly
Administrator
Air Quality Division

KK/cpr Project No. T1-9507-102-1 G:\Air Quality\Stationary Source\SS Ltd\T1\TASCO-Nampa\Final\T1-9507-102-1 Final PL.doc

Enclosures

cc: Sherry Davis, Air Quality Division
Tom Krinke, Boise Regional Office
Laurie Kral, EPA Region 10



**Air Quality
TIER I OPERATING PERMIT**

**State of Idaho
Department of Environmental Quality**

PERMIT NO.: 027-00010

AQCR: 064

CLASS: A

SIC: 2063

ZONE: 11

UTM COORDINATE (km): 534.5 , 4828.0

1. PERMITTEE

The Amalgamated Sugar Co. LLC

2. PROJECT

Tier I Operating Permit

3. MAILING ADDRESS

P.O. Box 8787

CITY

Nampa

STATE

ID

ZIP

83653-8787

4. FACILITY CONTACT

Joe Huff

TITLE

Plant Manager

TELEPHONE

(208) 466-3541

5. RESPONSIBLE OFFICIAL

Joe Huff

TITLE

Plant Manager

TELEPHONE

(208) 466-3541

6. EXACT PLANT LOCATION

138 W. Karcher Ave., Nampa, Idaho

COUNTY

Canyon

GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Beet sugar manufacturing

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.300 - 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality for the permitted source, unless the permittee emits toxic pollutants subject to State-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this permit.

The effective date of this permit is the date of signature by the Department on the cover page.

**KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: December 12, 2002

DATE EXPIRES: December 12, 2007

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
CSB	concentrated separator byproducts
Department	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gr/dscf	grains per dry standard cubic feet
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
KW	kilowatt
lb/hr	pounds per hour
LPG	liquefied petroleum gas
MMBtu/hr	million British thermal units per hour
MMscf/hr	million standard cubic feet per hour
NAAQS	National Ambient Air Quality Standards
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	Operations and Maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of ten micrometers or less
PTC	permit to construct
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
TASCO	The Amalgamated Sugar Co. LLC
TDS	total dissolved solids
TEOM	Tapered Element Oscillating Microbalance Ambient Air Monitor
T/d, T/hr, T/yr	tons per day, tons per hour, tons per year
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

1. TIER I OPERATING PERMIT SCOPE

Purpose

- 1.1 This Tier I operating permit establishes facility-wide requirements in accordance with the Idaho SIP control strategy and the *Rules for the Control of Air Pollution in Idaho*.
- 1.2 This Tier I operating permit incorporates all applicable permit terms from the following permits:
- Air Pollution Source Permit No. 13-0400-0010, dated March 19, 1981
 - Air Pollution Source Permit No. 0400-0010, dated January 1, 1984
 - Tier II Operating Permit No. 027-00010, dated September 30, 2002

Regulated Sources

- 1.3 Table 1.1 lists sources of emissions with specific provisions in this Tier I operating permit.

Table 1.1 SOURCES WITH SPECIFIC PERMIT CONDITIONS

Permit Sections	Source Description	Emissions Control(s)
3	Three coal/natural gas-fired boilers (S-B1, S-B2, S-B3)	Baghouse A-B1/2 and A-B3
4	One natural gas-fired boiler (S-B4)	None
5	Three pulp dryers (S-D1, S-D2, S-D3)	Cyclones A-D1A, A-D2A, A-D3A; Scrubbers A-D1B, A-D2B, A-D3A
6	Five pellet mills (S-D4, S-D5, S-D6, S-D7, S-D8)	Cyclones A-D4, A-D5, A-D6, A-D7, A-D8; Baghouse ^a
7	Two lime kilns (S-K1, S-K2)	60%: Gas washers A-K1A, A-K2A; Carbonation systems A-K1B, A-K2B; 40%: Baghouse A-K1/2
8	Two process slakers (S-K4)	Scrubber A-K4
9	One drying granulator (S-W1)	Scrubber A-W1
10	Two cooling granulators (S-W2, S-W3)	Scrubbers A-W2, A-W3
11	Four sugar-handling systems (S-W4, S-W5, S-W6, S-W7)	Baghouses A-W4, A-W5, A-W6, A-W7
12	Lime kiln building, main mill, and two sulfur stoves (S-K3, S-O1, S-O2, S-O3)	Lime kiln building: Baghouse A-K3 Main mill: None Stoves: Sulfur towers A-O2, A-O3

^a The pellet mill baghouse will be installed within one year of issuance of the Tier II operating permit; refer to Permit Condition 6.5.

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2. FACILITY-WIDE PERMIT CONDITIONS

Table 2.1 contains a summary of requirements that apply generally to emissions units at the facility:

Table 2.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
2.1, 2.2	Fugitive emissions	Reasonable control / Fugitive dust management plan	IDAPA 58.01.01.650-651, Tier II Operating Permit No. 027-00010	2.2, 2.3, 2.4, 2.22, 2.23
2.5	Odors	No emissions of odorous gases, liquids, or solids	IDAPA 58.01.01.775-776	2.6, 2.22, 2.23
2.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8, 2.22, 2.23
2.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	2.9.1-2.9.5, 2.22, 2.23
2.10	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	2.22
2.11	Air Stagnation Advisory	Compliance with IDAPA 58.01.01.550-562	IDAPA 58.01.01.550-562	2.22
2.12	Renovation and demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.22
2.13	Chemical accident prevention	Compliance with 40 CFR 68	40 CFR 68	2.22
2.14	Sulfur content limit	1.0% or less for coal	IDAPA 58.01.01.729	2.15, 2.22, 2.23
2.16	PM ₁₀ and SO ₂	Ambient monitoring requirements / No cause of or significant contribution to a NAAQS violation	Tier II Operating Permit No. 027-00010	2.16, 2.22, 2.23

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650 through 651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- 2.1.1 Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- 2.1.2 Application, where practical, of asphalt, water, or suitable chemicals to, or covering of dirt roads, material

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stockpiles, and other surfaces which can create dust.

2.1.3 Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.

2.1.4 Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.

2.1.5 Paving of roadways and their maintenance in a clean condition, where practical.

2.1.6 Prompt removal of earth or other stored material from streets, where practical.

[IDAPA 58.01.01.650-651, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

2.2 Within 60 days of the issuance of Tier II Operating Permit No. 027-00010 the permittee shall implement the following Fugitive Dust Management Plan to control fugitive emissions. The permittee shall monitor and maintain weekly records of any and all actions taken to comply with the measures, including, but not limited to, the frequency of application or observation, type and quantity of suppressant applied, the extent and date(s) of any deviation from any provision of Permit Condition 2.2, and actions implemented to correct any deviation(s).

2.2.1 Operate atomizing sprays at the coal unloading station (Emissions Unit No. F-04) during any material-moving activities at the unloading station.

2.2.2 Install and operate fugitive dust spray bar systems on all rolling stock, with the exception of the coal rolling packer and temporary rental equipment, associated with operations in the vicinity of the coal storage area.

2.2.3 Inspect and maintain the berm and trees at the eastern boundary of the facility as necessary, but not less than annually.

2.2.4 Apply a water or water/CSB dust suppressant to all facility roads, coal and coke haul roads, and beet unloading areas as necessary, but not less than weekly from May 1 through October 31 of each year.

2.2.5 Apply water to the coal pile, at least biweekly during unloading and transfer activities.

2.2.6 Apply a surfactant to the coal pile, at least once per year after the coal storage area has reached final grade.

[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

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- 2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each monthly fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00; Tier II Permit No. 027-00010, 9/30/02]

Odors

- 2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94]

- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

Visible Emissions

- 2.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 5/1/94]

- 2.8 The permittee shall conduct a monthly facility-wide inspection of potential point sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each monthly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

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Excess Emissions

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130 through 136 for excess emissions. The provisions of IDAPA 58.01.01.130 through 136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130 through 136.
- 2.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing such excess emissions event, to reduce the frequency of occurrence of such events, to minimize the amount by which the emission standard is exceeded, and shall, as provided below or upon request of the Department, submit a full report of such occurrence including a statement of all known causes and of the scheduling and nature of the actions to be taken.
[IDAPA 58.01.01.132, 4/5/00]
- 2.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to the following:
[IDAPA 58.01.01.133, 4/5/00]
- 2.9.2.1 A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory and/or a Wood Stove Curtailment Advisory have/has been declared by the Department.
[IDAPA 58.01.01.133.01.a, 3/20/97]
- 2.9.2.2 Notifying the Department of the excess emissions event as soon as reasonably possible, but no later than two hours prior to the start of the excess emission event, unless the owner or operator demonstrates to the Department's satisfaction that a shorter advanced notice was necessary.
[IDAPA 58.01.01.133.01.b, 4/5/00]
- 2.9.2.3 The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.
[IDAPA 58.01.01.133.01.c, 3/20/97]
- 2.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:
[IDAPA 58.01.01.134, 4/5/00]
- 2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:
[IDAPA 58.01.01.134.02, 4/5/00]

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- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
[IDAPA 58.01.01.134.02.a, 4/5/00]
 - The owner or operator shall notify the Department of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to the Department's satisfaction that the longer reporting period was necessary.
[IDAPA 58.01.01.134.02.b, 4/5/00]
 - The owner or operator shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.
[IDAPA 58.01.01.134.02.c, 3/20/97]
- 2.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, the Department may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess emissions has been corrected or brought under control. Such action by the Department shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.
[IDAPA 58.01.01.134.03 4/5/00]
- 2.9.4 A written report for each excess emissions event shall be submitted to the Department by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.
[IDAPA 58.01.01.135.01, 3/20/97; IDAPA 58.01.01.135.02, 4/5/00]
- 2.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The records shall be made available to Department representatives upon request. The excess emissions records shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:
[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]
- 2.9.5.1 An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to the Department pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment.
[IDAPA 58.01.01.136.03.a, 4/5/00]
- 2.9.5.2 Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.
**[IDAPA 58.01.01.136.03.b, 3/20/97; IDAPA 58.01.01.130-136, 4/5/00
(state-only; federally enforceable upon approval into the SIP), IDAPA 58.01.01.322.08.b, 3/23/98]**

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Open Burning

- 2.10 The permittee shall comply with the requirements of IDAPA 58.01.01.600 through 616, *Rules for Control of Open Burning*.
[IDAPA 58.01.01.600-616, 5/1/94]

Air Stagnation Advisory Days

- 2.11 For all affected units, the permittee shall comply with the requirements of IDAPA 58.01.01.561 during any air pollution emergency episode.
[IDAPA 58.01.01.550-562, 5/1/94]

Renovation/Demolition

- 2.12 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M, when conducting any renovation or demolition activities at the facility.
[40 CFR 61, Subpart M]

Regulated Substances for Accidental Release Prevention

- 2.13 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:
- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
 - The date on which a regulated substance is first present above a threshold quantity in a process.
- [40 CFR 68.10 (a)]

Sulfur Content

- 2.14 No person shall sell, distribute, use or make available for use, any coal containing greater than 1% sulfur by weight.
[IDAPA 58.01.01.729, 5/1/94]
- 2.15 The permittee shall monitor and record the sulfur content of each shipment of coal received by using the following:
- Obtaining a sulfur analysis certificate from the vendor for each shipment of coal received.
 - Analyzing, or having analyzed by a contract laboratory, a composite of representative samples taken by the permittee from each shipment of coal received. One composite sample shall be analyzed for every 1,000 tons of coal received. Coal samples shall be collected in accordance with ASTM D2243, and analyzed for sulfur content and British thermal unit rating using ASTM method D3177-75 or D4239-85.
- [IDAPA 58.01.01.322.06, 5/1/94]

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Ambient Monitoring Requirements

- 2.16 Within 12 months of Tier II operating permit issuance, the permittee shall install, maintain, and operate two reference PM₁₀ (one TEOM and one high volume), one reference SO₂, and meteorological monitoring equipment at a location(s) approved by the Department. Ambient air quality monitoring shall be performed to collect data on meteorological parameters and ambient concentrations of PM₁₀ and SO₂, as follows:
- 2.16.1 The permittee shall submit an ambient monitoring protocol to the Department for approval within 120 days of issuance of Tier II Operating Permit No. 027-00010. The protocol shall provide the specifications on the monitoring equipment and define the operating parameters for conducting the monitoring. The protocol, when approved, shall become part of the terms and conditions of the Tier II operating permit.
- 2.16.2 The ambient air monitoring site location(s) shall be selected through modeling analysis. The permittee shall submit a modeling analysis protocol to the Department for approval within 60 days of Tier II operating permit issuance. The permittee shall conduct and submit the modeling analysis for placing the monitors, with all backup data requested by the Department, for approval within 60 days after the modeling protocol is approved.
- 2.16.3 The permittee shall make the PM₁₀ TEOM and SO₂ monitoring station(s) data accessible to the Department on a real-time basis via telemetry. All monitoring data shall be submitted to the Department in accordance with the ambient monitoring protocol approved by the Department. The data shall be subject to Department quality assurance review. The Department may make all valid ambient air quality data available to the public.
- 2.16.4 The permittee may discontinue maintenance and operation of the SO₂ ambient air quality monitor at any time after all of the requirements of Permit Condition 14.5 have been satisfied.
- 2.16.5 The permittee may discontinue maintenance and operation of the PM₁₀ ambient air quality monitors at any time after all of the requirements of Permit Condition 14.9 have been satisfied.

[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

Compliance Testing

- 2.17 For all required compliance testing, the permittee shall provide notice of intent to test to the Department at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by Department approval. The Department may, at its option, have an observer present at any emissions tests conducted on a source. The Department requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior Department approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by the Department for any testing deviations, the Department may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is strongly encouraged to submit in writing to the Department, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- The proposed schedule for conducting and reporting the test

Within 30 days following the date on which a compliance test required by this permit is concluded, the permittee shall submit to the Department a report for the respective test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239
Tel.: (208) 373-0550
Fax: (208) 373-0287

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94;
Tier II Permit No. 027-00010, 9/30/02]

- 2.18 For all required compliance testing, the permittee shall use the test methods described in Table 2.2 to measure the pollutant emissions.

Table 2.2 EPA REFERENCE TEST METHODS

Pollutant	Test Method*	Special Conditions
PM ₁₀	EPAMethod 201.a and Method 202	
PM	EPA Method 5	
NO _x	EPA Method 7	
SO ₂	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Opacity	EPA Method 9	If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

*or Department-approved alternative in accordance with IDAPA 58.01.01.157

- 2.19 For all required compliance testing, the permittee shall address the required averaging period specified in accordance with IDAPA 58.01.01.679, and the altitude correction in IDAPA 58.01.01.680, prior to conducting the test.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

- 2.20 For all required compliance testing, a visible emissions evaluation shall be performed during each test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Operations and Maintenance Manual Requirements

- 2.21 The permittee shall develop an O&M manual for the appropriate emissions control device(s) each of the following sources: (a) the B&W No. 1, B&W No. 2, and Riley boilers; (b) the South, Center, and North dryers; (c) the No. 1, 2, 3, 4, and 5 pellet mills; (d) the A and B lime kilns; (e) A and B process slakers; (f) the drying granulator; (g) the No. 1 and No. 2 cooling granulators; (h) the process No.2, specialties, and packaging-line sugar handling systems; and (i) the lime kiln building. The permittee shall develop each O&M manual within the one year of issuance of the Tier II operating permit.
- 2.21.1 After the initial O&M manual development, the permittee shall update the control device monitoring program in the O&M manuals after each Department-approved performance test.
- 2.21.2 The O&M manuals shall address the operation, maintenance, and repair of applicable control device(s) for each source to ensure good working order and operation as efficiently as practicable. The manuals shall include, at a minimum, a general description of the control device(s); normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 2.22.
- 2.21.3 The O&M manuals shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The monitoring parameters shall include, but are not limited to, any specific control device monitoring parameter(s) required under any permit condition in this permit, unless the Department approves their removal from this permit condition. The control device monitoring program shall be developed by the permittee based on performance test results, vendor data, and other supporting documentation.
- 2.21.4 The O&M manual shall be maintained onsite and shall be made available to Department representatives upon request.
- 2.21.5 Whenever an operating parameter is outside the operating range specified by the control device monitoring program in an O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards, unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required.

[IDAPA 58.01.01.322.06, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Monitoring and Recordkeeping

- 2.22 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

Reports and Certifications

- 2.23 All periodic reports and certifications required by this permit shall be submitted to the Department within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130 through 136. Reports, certifications, and notifications shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239
Tel.: (208) 373-0550
Fax: (208) 373-0287

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to the following address:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

3. EMISSIONS UNIT: B&W NO. 1, B&W NO. 2, AND RILEY BOILERS (S-B1, S-B2, S-B3)**Summary Description**

The following is a narrative description of the coal/natural gas boilers regulated in this Tier I operating permit. This description is for informational purposes only.

The three boilers permitted in this section are fired by pulverized coal and natural gas; all are used to supply steam for processes at the facility. Table 3.1 contains a description of each boiler.

Table 3.1 BOILER DESCRIPTIONS

Boiler	Unit Number	Installation Date	Rated Steam Capacity (lb steam/hr)
B&W boiler No. 1	S-B1	1942	105,000
B&W boiler No. 2	S-B2	1942	105,000
Riley boiler	S-B3	1969	250,000

Table 3.2 describes the devices used to control emissions from the B&W boilers and Riley boiler.

Table 3.2 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device(s) / Unit Number(s)
B&W boilers No. 1 and 2	One baghouse / A-B1/2
Riley boiler	One baghouse / A-B3

Table 3.3 contains only a summary of the requirements that apply to the coal/natural gas boilers. Specific permit requirements are listed below Table 3.3.

Table 3.3 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
3.1	PM ₁₀ , CO	Refer to Table 3.4	Tier II Operating Permit No. 027-00010	3.7-3.9, 3.11
3.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	3.10, 3.11
3.3	PM	Refer to Table 3.5	Tier II Operating Permit No. 027-00010, IDAPA 58.01.01.677-678	3.7-3.9, 3.11
3.4	Sulfur content limit	1% or less for coal	Tier II Operating Permit No. 027-00010, IDAPA 58.01.01.729	2.15, 3.11
3.5	Fuel firing rate	Most recent Department-approved performance test	Tier II Operating Permit No. 027-00010	3.8, 3.11
3.6	Baghouse operation	At all times during boiler operation	Tier II Operating Permit No. 027-00010,	3.9, 3.11

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Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

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Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Permit Limits / Standard Summary

- 3.1 The total emissions of PM₁₀ and CO from the B&W No. 1, B&W No. 2, and Riley boilers shall not exceed any corresponding emissions rate limits listed in Table 3.4:

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Table 3.4 EMISSIONS LIMITS FOR COAL/NATURAL GAS-FIRED BOILERS

Source Description / Unit Number	PM ₁₀		CO	
	lb/hr	T/yr	lb/hr	T/yr
B&W No. 1 boiler / S-B1	138.1	604.3	36.4	159.0
B&W No. 2 boiler / S-B2				
Riley boiler / S-B3				

- 3.2 The emissions from the B&W Nos. 1 and 2 boiler stack, or the Riley boiler stack, or any other stack, vent, or functionally equivalent opening associated with the boilers, shall comply with Permit Condition 2.7.

[IDAPA 58.01.01.625, 4/5/00]

- 3.3 The permittee shall not discharge PM to the atmosphere from B&W No. 1 boiler, B&W No. 2 boiler, or the Riley boiler in excess of the concentrations shown in Table 3.5. When two fuels are burned concurrently, the allowable emissions shall be determined by proportioning the gross heat input and emission standard for each fuel. The effluent gas volume shall be corrected to the oxygen concentration shown.

[IDAPA 58.01.01.677-678, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

Table 3.5 ALLOWABLE PARTICULATE MATTER EMISSIONS BASED ON FUEL TYPE

Fuel Type	Allowable Particulate Emissions (gr/dscf)	Percent Oxygen
Coal or a combination of coal and natural gas	$0.100(X^a) + 0.011(Y^b)$	8.0
Natural gas	0.015	3.0

^a percent of total heat input derived from the combustion of coal

^b percent of total heat input derived from the combustion of natural gas

- 3.4 The permittee shall not use or fire coal with a sulfur content greater than 1% by weight.

[IDAPA 58.01.01.729, 5/1/94; IDAPA 58.01.01.322.01, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

- 3.5 For each boiler, the maximum allowable coal feeding rate and gas firing rate shall be limited to 120% of the average feed and firing rate attained during the most recent performance test conducted pursuant to Permit Condition 3.7, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emission limit(s), unless such a feed or firing rate would cause emissions to exceed any emission limit(s) set forth in this permit.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

- 3.6 The baghouses shall be operated and maintained at all times during boiler operation. The pressure drop across each of the baghouses shall be maintained within manufacturer or O&M manual specifications.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

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Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Monitoring / Recordkeeping Requirements

- 3.7 Performance tests shall be conducted on the B&W No. 1 boiler, the B&W No. 2 boiler, and the Riley boiler, during the first beet campaign following fulfillment of the provisions of Permit Condition 13.4 of Tier II Operating Permit No. 027-00010, to demonstrate compliance with the emission limits for PM₁₀ and CO in Permit Condition 3.1. The performance test shall be conducted after the requirements of Permit Condition 14.5.2 have been satisfied. For the PM₁₀ performance test, the boilers shall be tested with coal as the exclusive fuel. For the CO performance test, the boilers shall be tested with natural gas as the exclusive fuel.

Performance tests shall be conducted on the B&W No. 1, B&W No. 2, and Riley boilers during the first beet campaign following fulfillment of the provisions of Permit Condition 13.4 of Tier II Operating Permit No. 027-00010 to demonstrate compliance with the emission limit for PM in Permit Condition 3.3. The performance test shall be conducted after the requirements of Permit Condition 14.5.2 have been satisfied. The tests shall be conducted with coal as the exclusive fuel in the boilers.

- 3.7.1 The permittee shall monitor and record the steam production rate of the boiler; coal feed rate to the boiler in tons per hour or natural gas firing rate in MMscf/hr; the highest heating value and analysis results, including ash content, for the performance test with coal; and pressure drop across the baghouse during each test.
- 3.7.2 If any emission rate measured in the initial compliance test is less than or equal to 75% of an applicable emission standard in Permit Condition 3.1, no further testing shall be required during the life of the permit. If any emission rate measured during the compliance test is greater than 75%, but less than or equal to 90% of an applicable emission standard in Permit Condition 3.1, a second test shall be required in the third year of the permit term. If any emission rate measured during the compliance test is greater than 90% of an applicable emission standard in Permit Condition 3.1, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.06(c), (d), 07, 08, 09, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

- 3.8 The permittee shall monitor and record the information listed in Permit Conditions 3.8.1 through 3.8.8 for each boiler. The records shall be maintained in accordance with Permit Condition 2.22.
- 3.8.1 The average daily coal feed rate in tons per hour.
- 3.8.2 The coal feed rate for each consecutive 12-month period in tons per year.
- 3.8.3 The daily hours of operation with coal
- 3.8.4 The heat input rate expressed in millions of British thermal units per hour by correlating the coal feed rate with the coal high heating value.
- 3.8.5 The average daily gas-firing rate in millions of standard cubic feet per hour.
- 3.8.6 The gas-firing rate for each consecutive 12-month period in millions of standard cubic feet per year.
- 3.8.7 The daily hours of operation with gas.
- 3.8.8 The fuel type whenever the fuel type is changed. Fuel type in this section means natural gas only, coal only, or the combination of natural gas and coal.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

- 3.9 The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across each of the baghouses. The pressure drop shall be recorded once per week while the boilers are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Permit Condition 2.22.

[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

- 3.10 The permittee shall comply with Permit Condition 2.8, except that the inspections shall be conducted on a biweekly basis for the B&W No. 1, B&W No. 2, and Riley boilers. During any week that a facility-wide visible emissions inspection is conducted in accordance with Permit Condition 2.8, the facility-wide inspection shall fulfill the requirements of this permit condition for that week.

[IDAPA 58.01.01.322.06, 07, 08, 5/1/94]

Reporting

- 3.11 The permittee shall submit a summary report of the operational data and visible emissions inspection reports acquired by the monitoring required in Permit Conditions 3.8 through 3.10 to the Department and EPA every six months. The summary report is to be received no later than 30 days after the end of each six-month period.

[IDAPA 58.01.01.322.08, 11, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

4. EMISSIONS UNIT: UNION BOILER (S-B4)**Summary Description**

The following is a narrative description of the boiler regulated in this Tier I operating permit. This description is for informational purposes only.

The Union boiler is fired exclusively by natural gas and is used to supply steam to processes at the facility. This boiler was installed in 1957 and has a steaming capacity of 60,000 pounds of steam per hour.

Table 4.1 describes the devices used to control emissions from the Union boiler.

Table 4.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device
Union boiler	None

Table 4.2 contains only a summary of the requirements that apply to the Union boiler. Specific permit requirements are listed below Table 4.2.

Table 4.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping and Reporting Requirements
4.1	PM ₁₀ , CO	Refer to Table 4.3	Tier II Operating Permit No. 027-00010	4.6, 4.7, 4.9
4.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	4.8, 4.9
4.3	PM	0.015 gr/dscf at 3% oxygen	Tier II Operating Permit No. 027-00010; IDAPA 58.01.01.677	None required
4.5	Fuel-firing rate	Most recent Department-approved performance test	Tier II Operating Permit No. 027-00010	4.7, 4.9

Permit Limits / Standard Summary

- 4.1 The PM₁₀ and CO emissions from the Union boiler shall not exceed any corresponding emissions rate limits listed in Table 4.3:

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Table 4.3 UNION BOILER EMISSIONS LIMITS

Source Description / Unit Number	PM ₁₀		CO	
	lb/hr	T/yr	lb/hr	T/yr

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Union Boiler / S-B4	1.6	6.8	6.0	26.3
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AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 4.2 The emissions from the Union boiler stack, or any other stack, vent, or functionally equivalent opening associated with the Union boiler, shall comply with Permit Condition 2.7.
[IDAPA 58.01.01.625, 4/5/00]
- 4.3 The permittee shall not discharge PM to the atmosphere from the Union boiler in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume.
[IDAPA 58.01.01.677, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 4.4 The Union boiler shall be fired exclusively by natural gas.
[IDAPA 58.01.01.322.01, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 4.5 The maximum allowable gas-firing rate of the Union boiler shall be limited to 120% of the average firing rate attained during the most recent performance test conducted pursuant to Permit Condition 4.6, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emission limit(s), unless such a firing rate would cause emissions to exceed any emission limit(s) set forth in this permit.
[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Monitoring & Recordkeeping Requirements

- 4.6 Performance tests shall be conducted on the Union boiler, during the second beet campaign following fulfillment of the provisions of Permit Condition 13.4 of Tier II Operating Permit No. 027-00010, to demonstrate compliance with the emission limits for PM₁₀ and CO in Permit Condition 4.1.
- 4.6.1 The permittee shall monitor and record the steam production rate of the boiler and the gas-firing rate of the boiler.
[IDAPA 58.01.01.322.06(c), (d), 07, 08, 09, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 4.7 The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the gas-firing rate of the boiler. The average daily firing rate shall be recorded in millions of standard cubic feet per hour. The gas-firing rate for each consecutive 12-month period shall be recorded in millions of standard cubic feet per year. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Permit Condition 2.22.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 4.8 The permittee shall comply with Permit Condition 2.8.
[IDAPA 58.01.01.322.06, 07, 08, 5/1/94]

Reporting

- 4.9 The permittee shall submit a summary report of the operational data and visible emissions inspection reports acquired by the monitoring required in Permit Conditions 4.7 through 4.8 to the Department and EPA every six months. The summary report is to be received no later than 30 days after the end of each six-month period.
[IDAPA 58.01.01.322.08, 11, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

5. EMISSIONS UNIT: SOUTH, CENTER, AND NORTH PULP DRYERS (S-D1, S-D2, S-D3)**Summary Description**

The following is a narrative description of the three dryers regulated in this Tier I operating permit. This description is for informational purposes only.

The three dryers are direct-fired pulp dryers used to dry pressed beet pulp and produce cattle feed. The dryers are pulverized coal and natural gas-fired. Table 5.1 contains a description of each dryer.

Table 5.1 DRYER DESCRIPTIONS

Dryer	Unit Number	Installation Date	Input Design Capacity (T/hr)
South	S-D1	1968	65
Center	S-D2	1968	65
North	S-D3	1956	25

Within the fifth year of the permit term, the Center and North dryers will be replaced by a steam dryer system.

Table 5.2 describes the devices used to control emissions from the pulp dryers.

Table 5.2 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device(s) / Unit Number(s)
South pulp dryer	East stack: one cyclone and one scrubber in series / A-D1A, A-D1B
	West stack: one cyclone and one scrubber in series / A-D1A, A-D1B
Center pulp dryer	East stack: one cyclone and one scrubber in series / A-D2A, A-D2B
	West stack: one cyclone and one scrubber in series / A-D2A, A-D2B
North pulp dryer	One cyclone and one scrubber in series / A-D3A, A-D3B

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Table 5.3 contains only a summary of the requirements that apply to the three dryers. Specific permit requirements are listed below Table 5.3.

Table 5.3 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping and Reporting Requirements
5.1	PM ₁₀ , CO	Refer to Table 5.4	Tier II Operating Permit No. 027-00010	5.8-5.11, 5.13
5.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	5.12, 5.13
5.3	PM	Process weight rate	Tier II Operating Permit No. 027-00010, IDAPA 58.01.01.703	5.8-5.11, 5.13
5.4	Sulfur content limit	1% or less for coal	Tier II Operating Permit No. 027-00010, IDAPA 58.01.01.729	2.15, 5.13
5.5	Throughput and fuel-firing rate	Most recent Department-approved performance test	Tier II Operating Permit No. 027-00010	5.9, 5.13
5.6	Cyclone and scrubber operation	At all times during dryer operation	Tier II Operating Permit No. 027-00010	5.10, 5.13
5.7	TDS in scrubber water	O&M manual requirements	Tier II Operating Permit No. 027-00010	5.11, 5.13

Permit Limits / Standard Summary

- 5.1 Upon fulfillment of the requirements of Permit Condition 13.8 of Tier II Operating Permit No. 027-00010, PM₁₀ and CO emissions from the South dryer shall not exceed any corresponding emissions rate limits listed in the Table 5.4.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Table 5.4 SOUTH DRYER EMISSIONS LIMITS

Source Description / Unit Number	PM ₁₀		CO	
	lb/hr	T/yr	lb/hr	T/yr
South pulp dryer / S-D1	18.7	82.0	126.8	555.2

- 5.2 The emissions from any of the pulp dryer stacks, or any other stack, vent, or functionally equivalent opening associated with the pulp dryers, shall comply with Permit Condition 2.7.

[IDAPA 58.01.01.625, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

5.3 The permittee shall not emit PM to the atmosphere from any of the pulp dryers in excess of the amounts shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour and PW is the process weight in pounds per hour.

5.3.1 If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

5.3.2 If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00; Tier II Permit No. 027-00010, 9/30/02]

5.4 The permittee shall not use or fire coal with a sulfur content greater than 1% by weight.

[IDAPA 58.01.01.729, 5/1/94; IDAPA 58.01.01.322.01, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

5.5 The maximum allowable pulp throughput, coal feed rate, and natural gas-firing rate of the dryers shall be limited to 120% of the average rates attained during the most recent performance test conducted pursuant to Permit Conditions 14.4 or 5.8, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such throughput and feed rates would cause emissions to exceed any emissions limit(s) set forth in this permit. Throughput of each dryer shall be represented by the sum of the masses of coal, if applicable, wet pulp, and CSB fed to the dryer, and shall in no case exceed 65 tons per hour for either the South or Center dryer, nor 25 tons per hour for the North dryer.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

5.6 The cyclones and scrubbers shall be operated and maintained at all times during dryer operation. The scrubber differential pressure of the scrubbers shall be maintained within manufacturer or O&M manual specifications.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

5.7 The concentration of TDS in the scrubber water shall be maintained within manufacturer or O&M manual specifications.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Monitoring & Recordkeeping Requirements

5.8 Performance tests shall be conducted on the South dryer, during the first beet campaign following fulfillment of the provisions of Permit Condition 13.8 of Tier II Operating Permit No. 027-00010, to demonstrate compliance with the emission limits for PM₁₀ and CO in Permit Condition 5.1. The performance test shall be conducted after the requirements of Permit Condition 14.9 have been satisfied. For the PM₁₀ performance test, the dryer shall be tested with coal as the exclusive fuel. For the CO performance test, the dryer shall be tested with natural gas as the exclusive fuel.

Performance tests shall be conducted on the South dryer, during the first beet campaign following fulfillment of the provisions of Permit Condition 13.8 of Tier II Operating Permit No. 027-00010, to demonstrate compliance with the emission limit for PM in Permit Condition 5.3. The performance test shall be conducted after the requirements of Permit Condition 14.9 have been satisfied. The tests shall be conducted with coal as the exclusive fuel in the dryer.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 5.8.1 The permittee shall monitor and record the tons of wet pulp and CSB fed to the dryer, coal feed rate in tons per hour or natural gas-firing rate in MMscf/hr, and scrubber differential pressure of the scrubbers during each test.
- 5.8.2 The permittee shall collect a representative sample of recirculated water from the scrubber during each test. The concentration of TDS of the sample water shall be analyzed, recorded, and expressed in milligrams of solids per liter of water.
[IDAPA 58.01.01.322.06(c), (d), 07, 08, 09, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 5.9 The permittee shall monitor and record the information in Permit Conditions 5.9.1 through 5.9.9 for each dryer. The records shall be maintained in accordance with Permit Condition 2.22.
- 5.9.1 The average daily coal feed rate in tons per hour.
- 5.9.2 The coal feed rate for each consecutive 12-month period in tons per year.
- 5.9.3 The daily hours of operation with coal.
- 5.9.4 The average daily gas-firing rate in millions of standard cubic feet per hour.
- 5.9.5 The gas-firing rate for each consecutive 12-month period in millions of standard cubic feet per year.
- 5.9.6 The daily hours of operation with gas.
- 5.9.7 The average daily throughput in tons per hour.
- 5.9.8 The throughput rate for each consecutive 12-month period in tons per year.
- 5.9.9 The dryer fuel type whenever the fuel type is changed. Fuel type in this section means natural gas only, coal only, or the combination of natural gas and coal.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 5.10 The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the scrubber differential pressure of the scrubbers. The scrubber differential pressure shall be recorded once per week while the dryers are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Permit Condition 2.22.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 5.11 The permittee shall collect a representative sample of recirculated water from the scrubber biweekly from the start through the end of the campaign. The concentration of TDS in the sample water shall be analyzed and recorded in milligrams of solids per liter of water. The records shall be maintained in accordance with Permit Condition 2.22.
- 5.12 The permittee shall comply with Permit Condition 2.8, except that the inspections shall be conducted on a biweekly basis for the dryers. During any week that a visible emissions inspection is conducted in accordance with Permit Condition 2.8, the facility-wide inspection shall fulfill the requirements of this permit condition for that week.

[IDAPA 58.01.01.322.06, 07, 08, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Reporting

- 5.13 The permittee shall submit a summary report of the operational data and visible emissions inspection reports acquired by the monitoring required in Permit Conditions 5.9 through 5.12 to the Department and EPA every six months. The summary report is to be received no later than 30 days after the end of each six-month period.

[IDAPA 58.01.01.322.08, 11, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

6. EMISSIONS UNIT: PELLET MILLS (S-D4, S-D5, S-D6, S-D7, S-D8)**Summary Description**

The following is a narrative description of the pellet mills regulated in this Tier I operating permit. This description is for informational purposes only.

Pellet mills No. 1, 2, 3, 4, and 5 (Unit No. S-D4, S-D5, S-D6, S-D7, and S-D8, respectively) use forced ambient air to lower the temperature of the dry, pelletized pulp. The pellet mills are all manufactured by California Pellet Mill and were installed at various dates ranging from 1958 to 1972. Pellet mills No. 1 and 5 each have rated capacities of 4.4 tons of pellets per hour. Pellet mills No. 2, 3, and 4 each have rated capacities of 8.8 tons of pellets per hour.

Table 6.1 describes the devices used to control emissions from the pellet mills.

Table 6.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device(s) / Unit Number(s)
Pellet mill No. 1	One cyclone / A-D4
Pellet mill No. 2	One cyclone / A-D5
Pellet mill No. 3	One cyclone / A-D6
Pellet mill No. 4	One cyclone / A-D7
Pellet mill No. 5	One cyclone / A-D8

Within the first year of the permit term, one common baghouse will be installed to reduce emissions from the pellet mills.

Table 6.2 contains only a summary of the requirements that apply to the pellet mills. Specific permit requirements are listed below Table 6.2.

Table 6.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping and Reporting Requirements
6.1	PM ₁₀	Refer to Table 6.3	Tier II Operating Permit No. 027-00010	6.6-6.8, 6.10
6.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	6.9, 6.10
6.3	PM	Process weight	Tier II Operating Permit No. 027-00010, IDAPA 58.01.01.702	None required
6.4	Throughput rate limit	Most recent Department-approved performance test	Tier II Operating Permit No. 027-00010	6.7, 6.10
6.5	Baghouse installation and operation	Installation within one year of Tier II Operating Permit No. 027-00010 issuance and operation at all	Tier II Operating Permit No. 027-00010	6.8, 6.10

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

		times during mill operation		
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Permit Limits / Standard Summary

- 6.1 Upon fulfillment of the requirements of Permit Condition 13.4 of Tier II Operating Permit No. 027-00010, total PM₁₀ emissions from the pellet mills shall not exceed any corresponding emissions rate limits listed in Table 6.3.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Table 6.3 PELLET MILLS EMISSIONS LIMITS

Source Description / Unit Number	PM ₁₀	
	lb/hr	T/yr
Pellet mill No. 1 / S-D4	0.8	3.1
Pellet mill No. 2 / S-D5		
Pellet mill No. 3 / S-D6		
Pellet mill No. 4 / S-D7		
Pellet mill No. 5 / S-D8		

- 6.2 The emissions from any of the pellet mill stacks, or any other stack, vent, or functionally equivalent opening associated with the pellet mills, shall comply with Permit Condition 2.7.

[IDAPA 58.01.01.625, 4/5/00]

- 6.3 The permittee shall not emit PM to the atmosphere from any of the pellet mills in excess of the amounts shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour and PW is the process weight in pounds per hour.

- 6.3.1 If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- 6.3.2 If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00; Tier II Permit No. 027-00010, 9/30/02]

- 6.4 The total, combined pellet throughput of the mills shall be limited to 120% of the average, total throughput rate attained for the pellet mills during the most recent performance test conducted pursuant to Permit Condition 6.6, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emission limit(s), unless such a throughput rate would cause emissions to exceed any emission limit(s) set forth in this permit.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

- 6.5 Within the first year of Tier II Operating Permit No. 027-00010, a baghouse shall be installed on the pellet

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

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Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

mills' exhaust stream(s) prior to release to the atmosphere. The baghouse shall be operated and maintained at all times during pellet mill operation. The pressure drop across the baghouse shall be maintained within manufacturer or O&M manual specifications.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Monitoring & Recordkeeping Requirements

- 6.6 A performance test shall be conducted on the pellet mills during the first beet campaign following fulfillment of the provisions of Permit Condition 13.4 of Tier II Operating Permit No. 027-00010, to demonstrate compliance with the emission limits for PM₁₀ in Permit Condition 6.1. The performance test shall be conducted after the requirements of Permit Condition 6.5 have been satisfied.
- 6.6.1 The permittee shall monitor and record total throughput of the mills and the pressure drop across the baghouse during each test. Total throughput of the mills will be determined by the dry shred weight-o-meter.
[IDAPA 58.01.01.322.06(c), (d), 07, 08, 09, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 6.7 The permittee shall monitor and record the information in Permit Conditions 6.7.1 and 6.7.2 for the pellet mills. The records shall be maintained in accordance with Permit Condition 2.22.
- 6.7.1 The average daily throughput in tons per hour.
- 6.7.2 The throughput for each consecutive 12-month period in tons per year.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 6.8 Within the first year of the permit term, the permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across the baghouse. The pressure drop shall be recorded once per week while the pellet mills are in operation. In the event that any measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Permit Condition 2.22.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 6.9 The permittee shall comply with Permit Condition 2.8, except that the inspections shall be conducted on a biweekly basis for the pellet mills. During any week that a visible emissions inspection is conducted in accordance with Permit Condition 2.8, the facility-wide inspection shall fulfill the requirements of this permit condition for that week.
[IDAPA 58.01.01.322.06, 07, 08, 5/1/94]

Reporting

- 6.10 The permittee shall submit a summary report of the operational data and visible emissions inspection reports acquired by the monitoring required in Permit Conditions 6.7 through 6.9 to the Department and EPA every six months. The summary report is to be received no later than 30 days after the end of each six-month period.
[IDAPA 58.01.01.322.08, 11, 5/1/94, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

7. EMISSIONS UNIT: A AND B LIME KILNS (S-K1, S-K2)***Summary Description***

The following is a narrative description of the two lime kilns regulated in this Tier I operating permit. This description is for informational purposes only.

The A and B lime kilns (Unit No. S-K1 and S-K2, respectively) are used to produce burnt lime from a mixture of coke and lime rock. Both kilns were manufactured by Belgium Lime Kiln. The kilns have a batch feed system, but operate continuously. The A lime kiln was installed in 1942 and has a rated capacity of 238 tons of lime rock per day. The B lime kiln was installed in 1968 and has a rated capacity of 277 tons of lime rock per day.

Approximately 40% of the emissions from each kiln are controlled by a baghouse (Unit No. A-K1/2). Emissions are only directed to the baghouse during kiln-loading events. The remaining emissions (i.e., between loading events) from the A Lime Kiln are sent through two gas washers (Unit No. A-K1A) and the A lime kiln carbonation system (Unit No. A-K1B), in series. The remaining emissions (i.e., between loading events) from the B lime kiln are sent through the two gas washers (Unit No. A-K2A) and the B lime kiln carbonation system (Unit No. A-K2B), in series. Any CO emissions remaining after the carbonation systems are vented to the atmosphere.

Table 7.1 describes the devices used to control emissions from the lime kilns.

Table 7.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device(s) / Unit Number(s)
A Lime Kiln	60%: two scrubbers and two carbonation systems in series / A-K1A, A-K1B
	40%: one shared baghouse / A-K1/2
B Lime Kiln	60%: two scrubbers and two carbonation systems in series / A-K2A, A-K2B
	40%: one shared baghouse / A-K1/2

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Table 7.2 contains only a summary of the requirements that apply to the two lime kilns. Specific permit requirements are listed below Table 7.2.

Table 7.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping and Reporting Requirements
7.1	PM ₁₀ , CO	Refer to Table 7.3	Tier II Operating Permit No. 027-00010	7.6-7.8, 7.10
7.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	7.9, 7.10
7.3	PM	Process weight	Tier II Operating Permit No. 027-00010, IDAPA 58.01.01.702	None required
7.4	Throughput rate limit	120% of most recent Department -approved performance test	Tier II Operating Permit No. 027-00010	7.7, 7.10
7.5	Baghouse operation	At all times during kiln operation	Tier II Operating Permit No. 027-00010	7.8, 7.10

Permit Limits / Standard Summary

7.1 The PM₁₀ and CO emissions from the lime kilns shall not exceed any corresponding emissions rate limits listed in Table 7.3:

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Table 7.3 EMISSIONS LIMITS FOR LIME KILNS

Source Description / Unit Number	PM ₁₀		CO	
	lb/hr	T/yr	lb/hr	T/yr
A Lime kiln / S-K1	0.1	0.4	685.1	3000.7
B Lime kiln / S-K2	0.1	0.5	795.8	3485.6

7.2 The emissions from any of the lime kiln stacks, or any other stack, vent, or functionally equivalent opening associated with the lime kilns, shall comply with Permit Condition 2.7.

[IDAPA 58.01.01.625, 4/5/00]

7.3 The permittee shall not emit PM to the atmosphere from either lime kiln in excess of the amounts shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour and PW is the process weight in pounds per hour.

7.3.1 If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

7.3.2 If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00; Tier II Permit No. 027-00010, 9/30/02]

7.4 The maximum allowable lime rock throughput of each kiln shall be limited to 120% of the average throughput rates attained during the most recent performance test conducted pursuant to Permit Condition 7.6, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emission limit(s), unless such a throughput rate would cause emissions to exceed any emission limit(s) set forth in this permit.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

7.5 The baghouse shall be operated and maintained at all times during kiln operation. The pressure drop across the baghouse shall be maintained within manufacturer or O&M manual specifications.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Monitoring & Recordkeeping Requirements

7.6 Performance tests shall be conducted on the lime kilns, during the first beet campaign following fulfillment of the provisions of Permit Condition 13.4 of Tier II Operating Permit No. 027-00010 to demonstrate compliance with the emission limits for PM₁₀ and CO in Permit Condition 7.1.

7.6.1 The permittee shall monitor and record the lime rock throughput of each kiln and the pressure drop across the baghouse during each test.

[IDAPA 58.01.01.322.06(c), (d), 07, 08, 09, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

7.7 The permittee shall monitor and record the information in Permit Conditions 7.7.1 and 7.7.2 for each lime kiln. The records shall be maintained in accordance with Permit Condition 2.22.

7.7.1 The average daily throughput in tons per hour.

7.7.2 The throughput for each consecutive 12-month period in tons per year.

[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

7.8 The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across the baghouse. The pressure drop shall be recorded once per week while the lime kilns are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Permit Condition 2.22.

[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

7.9 The permittee shall comply with Permit Condition 2.8, except that the inspections shall be conducted on a biweekly basis for the lime kilns. During any week that a visible emissions inspection is conducted in accordance with Permit Condition 2.8, the facility-wide inspection shall fulfill the requirements of this permit condition for that week.

[IDAPA 58.01.01.322.06, 07, 08, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Reporting

- 7.10 The permittee shall submit a summary report of the operational data and visible emissions inspection reports acquired by the monitoring required in Permit Conditions 7.7 through 7.9 to the Department and EPA every six months. The summary report is to be received no later than 30 days after the end of each six-month period.

[IDAPA 58.01.01.322.08, 11, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

8. EMISSIONS UNIT: PROCESS SLAKERS (S-K4)**Summary Description**

The following is a narrative description of the two process slakers regulated in this Tier I operating permit. This description is for informational purposes only.

The facility operates the A and B process slakers (Unit No. S-K4) to produce milk of lime from crushed calcium oxide rocks and water. The slakers were manufactured by Ogden Iron Works and are operated as batch systems. The slakers were installed in 1968 and have a total rated capacity of 257 tons of calcium oxide rock per day.

Table 8.1 describes the devices used to control emissions from the process slakers.

Table 8.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Units / Process(es)	Emissions Control Device / Unit Number
A process slaker	One scrubber / A-K4
B process slaker	

Table 8.2 contains only a summary of the requirements that apply to the two process slakers. Specific permit requirements are listed below Table 8.2.

Table 8.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping and Reporting Requirements
8.1	PM ₁₀	Refer to Table 8.3	Tier II Operating Permit No. 027-00010	8.6-8.8, 8.10
8.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	8.9, 8.10
8.3	PM	Process weight	Tier II Operating Permit No. 027-00010, IDAPA 58.01.01.702	8.6-8.8, 8.10
8.4	Throughput rate limit	120% of most recent Department- approved performance test	Tier II Operating Permit No. 027-00010	8.7, 8.10
8.5	Scrubber operation	At all times during slaker operation	Tier II Operating Permit No. 027-00010	8.8, 8.10

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Permit Limits / Standard Summary

- 8.1 The PM₁₀ emissions from the process slakers shall not exceed any corresponding emissions rate limits listed in Table 8.3:

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Table 8.3 EMISSIONS LIMITS FOR PROCESS SLAKERS

Source Description / Unit Number	PM ₁₀	
	lb/hr	T/yr
A and B process slakers / S-K4	1.4	6.1

- 8.2 The emissions from the process slakers' stack, or any other stack, vent, or functionally equivalent opening associated with the process slakers, shall comply with Permit Condition 2.7.

[IDAPA 58.01.01.625, 4/5/00]

- 8.3 The permittee shall not emit PM to the atmosphere from the process slakers in excess of the amounts shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour and PW is the process weight in pounds per hour.

- 8.3.1 If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- 8.3.2 If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00; Tier II Permit No. 027-00010, 9/30/02]

- 8.4 The maximum allowable calcium oxide rock throughput of each process slaker shall be limited to 120% of the average throughput rates attained during the most recent performance test conducted pursuant to Permit Condition 8.6, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emission limit(s), unless such a throughput rate would cause emissions to exceed any emission limit(s) set forth in this permit.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

- 8.5 The scrubber shall be operated and maintained at all times during slaker operation. The scrubber nozzle header pressure shall be maintained within manufacturer or O&M manual specifications.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Monitoring & Recordkeeping Requirements

- 8.6 Performance tests shall be conducted on the process slakers during the second beet campaign following fulfillment of the provisions of Permit Condition 13.4 of Tier II Operating Permit No. 027-00010 to demonstrate compliance with the emission limits for PM₁₀ in Permit Condition 8.1 and the emissions limit for PM in Permit Condition 8.3.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 8.6.1 The permittee shall monitor and record the calcium oxide rock throughput of each process slaker and the scrubber nozzle header pressure during each test.
[IDAPA 58.01.01.322.06(c), (d), 07, 08, 09, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 8.7 The permittee shall monitor and record the information in Permit Conditions 8.7.1 and 8.7.2 for each process slaker. The records shall be maintained in accordance with Permit Condition 2.22.
- 8.7.1 The average daily calcium oxide rock throughput in tons per hour.
- 8.7.2 The calcium oxide rock throughput for each consecutive 12-month period in tons per year.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 8.8 The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the scrubber nozzle header pressure. The scrubber nozzle header pressure shall be recorded once per week when the process slakers are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Permit Condition 2.22.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 8.9 The permittee shall comply with Permit Condition 2.8.
[IDAPA 58.01.01.322.06, 07, 08, 5/1/94]

Reporting

- 8.10 The permittee shall submit a summary report of the operational data and visible emissions inspection reports acquired by the monitoring required in Permit Conditions 8.7 through 8.9 to the Department and EPA every six months. The summary report is to be received no later than 30 days after the end of each six-month period.
[IDAPA 58.01.01.322.08, 11, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

9. EMISSIONS UNIT: DRYING GRANULATOR (S-W1)**Summary Description**

The following is a narrative description of the drying granulator regulated in this Tier I operating permit. This description is for informational purposes only.

The facility operates a drying granulator (Unit No. S-W1) to dry wet sugar. The drying granulator was manufactured by TESCO and installed in 1987 as a replacement for an existing drying granulator. The rated capacity of the granulator is 46 tons of sugar per hour.

Table 9.1 describes the devices used to control emissions from the drying granulator.

Table 9.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device / Unit Number
Drying granulator	Scrubber / A-W1

Table 9.2 contains only a summary of the requirements that apply to the drying granulator. Specific permit requirements are listed below Table 9.2.

Table 9.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping and Reporting Requirements
9.1	PM ₁₀	Refer to Table 9.3	Tier II Operating Permit No. 027-00010	9.6-9.8, 9.10
9.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	9.9, 9.10
9.3	PM	Process weight	Tier II Operating Permit No. 027-00010, IDAPA 58.01.01.701	9.6-9.8, 9.10
9.4	Throughput rate limit	Most recent Department-approved performance test	Tier II Operating Permit No. 027-00010	9.7, 9.10
9.5	Scrubber operation	At all times during granulator operation	Tier II Operating Permit No. 027-00010	9.8, 9.10

Permit Limits / Standard Summary

9.1 The PM₁₀ emissions from the drying granulator shall not exceed any corresponding emissions rate limits listed in Table 9.3:

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Table 9.3 EMISSIONS LIMITS FOR DRYING GRANULATOR

Source Description / Unit Number	PM ₁₀	
	lb/hr	T/yr
Drying granulator / S-W1	1.1	5.0

- 9.2 The emissions from the drying granulator stack, or any other stack, vent, or functionally equivalent opening associated with the drying granulator, shall comply with Permit Condition 2.7.

[IDAPA 58.01.01.625, 4/5/00]

- 9.3 The permittee shall not emit PM to the atmosphere from the drying granulator in excess of the amounts shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour and PW is the process weight in pound per hour.

- 9.3.1 If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- 9.3.2 If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00; Tier II Permit No. 027-00010, 9/30/02]

- 9.4 The maximum allowable throughput of the drying granulator shall be limited to 120% of the average throughput rates attained during the most recent performance test conducted pursuant to Permit Condition 9.6, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emission limit(s), unless such a throughput rate would cause emissions to exceed any emission limit(s) set forth in this permit.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

- 9.5 The scrubber shall be operated and maintained at all times during granulator operation. The brix of the scrubber fluid shall be maintained within manufacturer or O&M manual specifications. Brix is defined as percent solids in thin juice.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Monitoring & Recordkeeping Requirements

- 9.6 Performance tests shall be conducted on the drying granulator during the second beet campaign following fulfillment of the provisions of Permit Condition 13.4 of Tier II Operating Permit No. 027-00010 to demonstrate compliance with the emission limits for PM₁₀ in Permit Condition 9.1 and the emission limits for PM in Permit Condition 9.3.

- 9.6.1 The permittee shall monitor and record the throughput of the drying granulator and the brix of the scrubber fluid during each test.

[IDAPA 58.01.01.322.06(c), (d), 07, 08, 09, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

- 9.7 The permittee shall monitor and record the information in Permit Conditions 9.7.1 and 9.7.2 for the

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

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Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

drying granulator. The records shall be maintained in accordance with Permit Condition 2.22.

9.7.1 The average daily throughput in tons per hour.

9.7.2 The throughput for each consecutive 12-month period in tons per year.

[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

9.8 The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the brix of the scrubber fluid. The brix shall be recorded once per day while the drying granulator is in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Permit Condition 2.22.

[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

9.9 The permittee shall comply with Permit Condition 2.8.

[IDAPA 58.01.01.322.06, 07, 08, 5/1/94]

Reporting

9.10 The permittee shall submit a summary report of the operational data and visible emissions inspection reports acquired by the monitoring required in Permit Conditions 9.7 through 9.9 to the Department and EPA every six months. The summary report is to be received no later than 30 days after the end of each six-month period.

[IDAPA 58.01.01.322.08, 11, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

10. EMISSIONS UNIT: NO. 1 AND NO. 2 COOLING GRANULATORS (S-W2, S-W3)**Summary Description**

The following is a narrative description of the cooling granulators regulated in this Tier I operating permit. This description is for informational purposes only.

The facility operates the No. 1 and 2 cooling granulators (Unit No. S-W2 and S-W3, respectively) to cool hot sugar from the drying granulator. The No. 1 cooling granulator was manufactured by Hersey and was installed in 1944. The No. 2 cooling granulator was manufactured by Great Western Sugar and was installed in 1981. Per the Tier II operating permit application, the rated capacity of each granulator is 27.5 tons of sugar per hour.

Table 10.1 describes the devices used to control emissions from the cooling granulators.

Table 10.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device(s) / Unit Number(s)
No. 1 Cooling granulator	One baghouse / A-W2
No. 2 Cooling granulator	One baghouse / A-W3

Table 10.2 contains only a summary of the requirements that apply to the cooling granulators. Specific permit requirements are listed below Table 10.2.

Table 10.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping and Reporting Requirements
10.1	PM ₁₀	Refer to Table 10.3	Tier II Operating Permit No. 027-00010	10.7-10.9, 10.11
10.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	10.10, 10.11
10.3-10.4	PM	Process weight	Tier II Operating Permit No. 027-00010, IDAPA 58.01.01.701 and 702	None required
10.5	Throughput rate limit	Most recent Department-approved performance test	Tier II Operating Permit No. 027-00010	10.8, 10.11
10.6	Baghouse operation	At all times during granulator operation	Tier II Operating Permit No. 027-00010	10.9, 10.11

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Permit Limits / Standard Summary

- 10.1 The PM₁₀ emissions from the cooling granulators shall not exceed any corresponding emissions rate limits listed in Table 10.3:

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Table 10.3 EMISSIONS LIMITS FOR COOLING GRANULATORS

Source Description / Unit Number	PM ₁₀	
	lb/hr	T/yr
No. 1 cooling granulator / S-W2	0.3	1.3
No. 2 cooling granulator / S-W3	0.3	1.3

- 10.2 The emissions from either of the cooling granulator stacks, or any other stack, vent, or functionally equivalent opening associated with the cooling granulators, shall comply with Permit Condition 2.7.

[IDAPA 58.01.01.625, 4/5/00]

- 10.3 The permittee shall not emit PM to the atmosphere from the No. 1 cooling granulator in excess of the amounts shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour and PW is the process weight in pounds per hour.

- 10.3.1 If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- 10.3.2 If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00; Tier II Permit No. 027-00010, 9/30/02]

- 10.4 The permittee shall not emit PM to the atmosphere from the No. 2 cooling granulator in excess of the amounts shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour and PW is the process weight in pounds per hour.

- 10.4.1 If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- 10.4.2 If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00; Tier II Permit No. 027-00010, 9/30/02]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 10.5 The maximum allowable throughput of each cooling granulator shall be limited to 120% of the average throughput rate attained during the most recent performance test conducted pursuant to Permit Condition 10.7, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emission limit(s), unless such throughput rates would cause emissions to exceed any emission limit(s) set forth in this permit. The performance test conducted on the No. 1 cooling granulator shall be utilized to establish throughput limits for the No. 2 cooling granulator.
[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]
- 10.6 The baghouses shall be operated and maintained at all times during granulator operation. The pressure drop across the baghouses shall be maintained within manufacturer or O&M manual specifications.
[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Monitoring & Recordkeeping Requirements

- 10.7 Performance tests shall be conducted on the No. 1 cooling granulator during the third beet campaign following fulfillment of the provisions of Permit Condition 13.4 of Tier II Operating Permit No. 027-00010 to demonstrate compliance with the emission limits for PM₁₀ in Permit Condition 10.1.
- 10.7.1 The permittee shall monitor and record the throughput of the granulator and the pressure drop across the baghouse during each test.
[IDAPA 58.01.01.322.06(c), (d), 07, 08, 09, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 10.8 The permittee shall monitor and record the information in Permit Conditions 10.8.1 and 10.8.2 for each cooling granulator. The records shall be maintained in accordance with Permit Condition 2.22.
- 10.8.1 The average daily throughput in tons per hour.
- 10.8.2 The throughput for each consecutive 12-month period in tons per year.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 10.9 The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across each of the baghouses. The pressure drops shall be recorded once per week while the cooling granulators are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Permit Condition 2.22.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 10.10 The permittee shall comply with Permit Condition 2.8.
[IDAPA 58.01.01.322.06, 07, 08, 5/1/94]

Reporting

- 10.11 The permittee shall submit a summary report of the operational data and visible emissions inspection reports acquired by the monitoring required in Permit Conditions 10.8 through 10.10 to the Department and EPA every six months. The summary report is to be received no later than 30 days after the end of each six-month period.
[IDAPA 58.01.01.322.08, 11, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

11. EMISSIONS UNIT: PROCESS NO. 2, SUGAR REMELT, SPECIALTIES, AND PACKAGING LINE SUGAR-HANDLING SYSTEMS (S-W4, S-W5, S-W6, S-W7)

Summary Description

The following is a narrative description of the sugar-handling systems regulated in this Tier I operating permit. This description is for informational purposes only.

The sugar handling emissions regulated in this section of the permit come from four systems. The process No. 2 sugar handling system (Unit No. S-W4) was installed in 1965 and consists of elevators, scrolls, baggers, rotexes, screen stations, bagging stations, and scales. The sugar-remelt handling system (Unit No. S-W5) was installed in 1965 and consists of miscellaneous pick-up points and housekeeping activities. The specialties sugar handling system (Unit No. S-W6) was installed in 1965 and consists of a palletizing belt and tote machine. The packaging line sugar handling system (Unit No. S-W7) was installed in 1982 and consists of scrolls, baggers, and a loading scale. Emissions from each system are controlled by a baghouse.

Table 11.1 describes the devices used to control emissions from the emissions units listed.

Table 11.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device(s) / Unit Number(s)
Process No. 2 handling system	One baghouse / A-W4
Sugar-remelt handling system	One baghouse / A-W5
Specialties handling system	One baghouse / A-W6
Packaging line handling system	One baghouse / A-W7

Table 11.2 contains only a summary of the requirements that apply to the sugar-handling systems. Specific permit requirements are listed below Table 11.2.

Table 11.2 Summary Of Requirements

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping and Reporting Requirements
11.1	PM ₁₀	Refer to Table 11.3	Tier II Operating Permit No. 027-00010	11.7-11.9, 11.11
11.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	11.10, 11.11
11.3-11.4	PM	Process weight	Tier II Operating Permit No. 027-00010, IDAPA 58.01.01.701 and 702	11.7-11.9, 11.11
11.5	Throughput rate limit	Most recent Department-approved performance test	Tier II Operating Permit No. 027-00010	11.8, 11.11
11.6	Baghouse operation	At all times during handling system operation	Tier II Operating Permit No. 027-00010	11.9, 11.11

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Permit Limits / Standard Summary

- 11.1 The PM₁₀ emissions from the sugar-handling systems shall not exceed any corresponding emissions rate limits listed in Table 11.3:

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Table 11.3 EMISSIONS LIMITS FOR THE SUGAR-HANDLING SYSTEM

Source Description / Unit Number	PM ₁₀	
	lb/hr	T/yr
Process No. 2 system / S-W4	0.3	1.2
Specialties system / S-W6	0.1	0.6
Packaging line system / S-W7	0.2	0.9

- 11.2 The emissions from any of the sugar-handling system stacks, or any other stack, vent, or functionally equivalent opening associated with sugar handling, shall comply with Permit Condition 2.7.

[IDAPA 58.01.01.625, 4/5/00]

- 11.3 The permittee shall not emit PM to the atmosphere from the No. 2 process, sugar-remelt, or specialties lines in excess of the amounts shown in the following equations, where E is the total rate of emission from all emission points from the source in pound per hour and PW is the process weight in pound per hour.

- 11.3.1 If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- 11.3.2 If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00; Tier II Permit No. 027-00010, 9/30/02]

- 11.4 The permittee shall not emit PM to the atmosphere from the packaging line in excess of the amounts shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour and PW is the process weight in pounds per hour.

- 11.4.1 If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- 11.4.2 If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00; Tier II Permit No. 027-00010, 9/30/02]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 11.5 The maximum allowable throughput of each sugar handling system shall be limited to 120% of the average throughput rates attained during the most recent performance test conducted pursuant to Permit Condition 11.7, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emission limit(s), unless such throughput rates would cause emissions to exceed any emission limit(s) set forth in this permit.
[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]
- 11.6 The baghouses shall be operated and maintained at all times during the operation of the No. 2 process, sugar-remelt, specialties, or packaging line. The pressure drop across each baghouse shall be maintained within manufacturer or O&M manual specifications.
[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Monitoring & Recordkeeping Requirements

- 11.7 Performance tests shall be conducted on each of the No. 2 process, specialties, and packaging line sugar -handling systems during the third beet campaign following fulfillment of the provisions of Permit Condition 13.4 of Tier II Operating Permit No. 027-00010 to demonstrate compliance with the emissions limits for PM₁₀ in Permit Condition 11.1 and the applicable emissions limit for PM in Permit Condition 11.3 or 11.4.

Performance tests shall be conducted on the sugar-remelt sugar handling system during the third beet campaign following issuance of the Tier I operating permit to demonstrate compliance with the emissions limit for PM in Permit Condition 11.3.
- 11.7.1 The permittee shall monitor and record the throughput of the sugar handling system and the pressure drop across the baghouse during each test.
[IDAPA 58.01.01.322.06(c), (d), 07, 08, 09, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 11.8 The permittee shall monitor and record the information in Permit Conditions 11.8.1 and 11.8.2 for each sugar handling system. The records shall be maintained in accordance with Permit Condition 2.22.
- 11.8.1 The average daily throughput in tons per hour.
- 11.8.2 The throughput for each consecutive 12-month period in tons per year.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 11.9 The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across each of the baghouses. The pressure drops shall be recorded once per week while the sugar-handling systems are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Permit Condition 2.22.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 11.10 The permittee shall comply with Permit Condition 2.8.
[IDAPA 58.01.01.322.06, 07, 08, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Reporting

- 11.11 The permittee shall submit a summary report of the operational data and visible emissions inspection reports acquired by the monitoring required in Permit Conditions 11.8 through 11.10 to the Department and EPA every six months. The summary report is to be received no later than 30 days after the end of each six-month period.

[IDAPA 58.01.01.322.08, 11, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

12. EMISSIONS UNIT: LIME KILN BUILDING, MAIN MILL, AND SULFUR STOVES (S-K3, S-O1, S-O2, S-O3)

Summary Description

The following is a narrative description of the lime kiln building, main mill, and sulfur stoves regulated in this Tier I operating permit. This description is for informational purposes only.

Emissions from the vents of the lime kiln building (Unit No. S-K3) are created by one crusher and all coke-, lime-rock-, and calcium oxide-handling processes within the building. Thin juice is processed in the main mill (Unit No. S-O1). The main mill was installed prior to 1970 and has a maximum throughput of 180,000 gallons of thin juice. The A Side and B Side sulfur stoves (Unit No. S-O2 and S-O3, respectively) are used to burn sulfur to generate SO₂ that is used in the juice purification stage. The A Side stove was installed in 1945, while the B Side stove was installed in 1968. The sulfur stoves are batch processes, with a maximum throughput of 0.38 tons of sulfur per stove per day.

Table 12.1 describes the devices used to control emissions from the emissions units listed.

Table 12.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device(s) / Unit Number(s)
Lime kiln building	Baghouse / A-K3
Main mill	None
A side sulfur stove	Sulfur tower / A-O2
B side sulfur stove	Sulfur tower / A-O3

Table 12.2 contains only a summary of the requirements that apply to the main mill and sulfur stoves. Specific permit requirements are listed below Table 12.2.

Table 12.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping and Reporting Requirements
12.1	PM ₁₀	Refer to Table 12.3	Tier II Operating Permit No. 027-00010	12.6-12.8, 12.10
12.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	12.9, 12.10
12.3	PM	Process weight	Tier II Operating Permit No. 027-00010, IDAPA 58.01.01.701 and 702	None required
12.4	Throughput rate limit	120% of most recent Department- approved performance test	Tier II Operating Permit No. 027-00010	12.7, 12.10
12.5	Baghouse operation	At all times during handling system operation	Tier II Operating Permit No. 027-00010	12.8, 12.10

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Permit Limits / Standard Summary

- 12.1 The PM₁₀ emissions from the lime kiln building shall not exceed any corresponding emissions rate limits listed in Table 12.3:

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Table 12.3 EMISSIONS LIMITS FOR LIME KILN BUILDING

Source Description / Unit Number	PM ₁₀	
	lb/hr	T/yr
Lime kiln building / S-K3	0.8	3.5

- 12.2 The emissions from the lime kiln building, main mill, or sulfur stove stacks, or any other stack, vent, or functionally equivalent opening associated with the lime kiln building or sulfur stoves, shall comply with Permit Condition 2.7.

[IDAPA 58.01.01.625, 4/5/00]

- 12.3 The permittee shall not emit PM to the atmosphere from the lime kiln building in excess of the amounts shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour and PW is the process weight in pounds per hour.

- 12.3.1 If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- 12.3.2 If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00; Tier II Permit No. 027-00010, 9/30/02]

- 12.4 The maximum allowable throughput of lime rock to the kilns shall be limited to 120% of the average throughput rates attained during the most recent performance test conducted pursuant to Permit Condition 12.6, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emission limit(s), unless such throughput rates would cause emissions to exceed any emission limit(s) set forth in this permit.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

- 12.5 The baghouse shall be operated and maintained at all times during operation of the crusher or any coke, lime-rock, and calcium oxide-handling processes within the lime kiln building. The pressure drop across the baghouse shall be maintained within manufacturer or O&M manual specifications.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

Monitoring & Recordkeeping Requirements

- 12.6 Performance tests shall be conducted on the lime kiln building baghouse during the third year of Tier II Operating Permit No. 027-00010 to demonstrate compliance with the emissions limit for PM₁₀ in Permit Condition 12.3.

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- 12.6.1 The permittee shall monitor and record the total throughput of lime rock to the kilns and the pressure drop across the lime kiln building baghouse during each test.
[IDAPA 58.01.01.322.06(c), (d), 07, 08, 09, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 12.7 The permittee shall monitor and record the information in Permit Conditions 12.7.1 and 12.7.2 for the lime kiln building. The records shall be maintained in accordance with Permit Condition 2.22.
- 12.7.1 The average daily throughput of lime rock to the kilns in tons per hour.
- 12.7.2 The throughput of lime rock to the kilns for each consecutive 12-month period in tons per year.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 12.8 The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across the lime kiln building baghouse. The pressure drop shall be recorded once per week while the crusher and/or any coke, lime rock, or calcium oxide handling processes are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Permit Condition 2.22.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 12.9 The permittee shall comply with Permit Condition 2.8.
[IDAPA 58.01.01.322.06, 07, 08, 5/1/94]

Reporting

- 12.10 The permittee shall submit a summary report of the operational data and visible emissions inspection reports acquired by the monitoring required in Permit Conditions 12.7 through 12.9 to the Department and EPA every six months. The summary report is to be received no later than 30 days after the end of each six-month period.
[IDAPA 58.01.01.322.08, 11, 5/1/94]

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13. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in the Tier I operating permit to qualify for a permit shield.

Table 13.1 INSIGNIFICANT ACTIVITIES

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
Gasoline storage tanks with less than or equal to 10,000-gallon capacity with lids or other appropriate closures	IDAPA 58.01.01.317.01(b)(i)(3)
Combustion sources less than 5 MMBtu/hr using natural gas, butane, propane, and/or LPG (heaters and railcar propane lances)	IDAPA 58.01.01.317.01(b)(i)(5)
Printing and silkscreening using less than 2 gallons of ink per day (Ink for package coding)	IDAPA 58.01.01.317.01(b)(i)(12)
Hot water heaters less than 5 MMBtu/hr using natural gas, propane, or kerosene	IDAPA 58.01.01.317.01(b)(i)(18)
Process defoamer tank	IDAPA 58.01.01.317.01(b)(i)(19)
Sulfuric acid tank	IDAPA 58.01.01.317.01(b)(i)(19)
Ammonium bisulfate solution tank	IDAPA 58.01.01.317.01(b)(i)(19)
Flume defoamer tank	IDAPA 58.01.01.317.01(b)(i)(19)
Sodium hypochlorite tank	IDAPA 58.01.01.317.01(b)(i)(19)
Liquid aluminum sulfate tank	IDAPA 58.01.01.317.01(b)(i)(19)
Caustic soda tank	IDAPA 58.01.01.317.01(b)(i)(19)
Summer boiler	IDAPA 58.01.01.317.01(b)(i)(30)
Wet and pressed pulp handling	IDAPA 58.01.01.317.01(b)(i)(30)
Gypsum pneumatic conveyance system	IDAPA 58.01.01.317.01(b)(i)(30)
Fume slaker	IDAPA 58.01.01.317.01(b)(i)(30)
Coke handling	IDAPA 58.01.01.317.01(b)(i)(30)
Lime rock handling	IDAPA 58.01.01.317.01(b)(i)(30)
Lime kiln loadout (during start-up and shut-down)	IDAPA 58.01.01.317.01(b)(i)(30)
Beet hauling	IDAPA 58.01.01.317.01(b)(i)(30)
Coal unloading	IDAPA 58.01.01.317.01(b)(i)(30)
Pellet mill fan vents	IDAPA 58.01.01.317.01(b)(i)(30)
Powdered sugar baghouse handling	IDAPA 58.01.01.317.01(b)(i)(30)
Sugar baghouse handling	IDAPA 58.01.01.317.01(b)(i)(30)

- 13.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the Facility-wide Permit Conditions.

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14. COMPLIANCE SCHEDULE

- 14.1 To ensure compliance with applicable requirements in the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.001 et seq., the permittee shall implement the compliance schedule presented in Table 14.1. Permit Conditions 14.3 through 14.10 are necessary to ensure that emissions from the facility do not cause or significantly contribute to a violation of the NAAQS. Permit Conditions 14.12 through 14.17 are required for each source that may have been required to, but did not obtain, a PTC prior to construction and/or modification. Any changes in equipment, control technology or timeframes specified in this compliance schedule must be approved by the Department.

The permittee has the continuing responsibility to submit any supplementary information needed, including information for any other sources, in accordance with IDAPA 58.01.01.315.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.315, 5/1/94;
Tier II Permit No. 027-00010, 9/30/02]

Table 14.1 COMPLIANCE SCHEDULE

Permit Conditions	Milestone	Deadline	Documentation/Reporting
14.3	Fugitive dust management plan implementation	60 days after issuance of Tier II Operating Permit No. 027-00010	Permit Conditions 2.2, 2.3, and 2.4
			Department notification
14.4	Performance test the pulp dryers	120 days after issuance of Tier II Operating Permit No. 027-00010, but before end of 2002/2003 beet campaign	Department notification
14.5	Installation and operation of pellet mill cyclone baghouse	One year after issuance of Tier II Operating Permit No. 027-00010	Permit Conditions 6.7 and 6.9
	Flue gases from Riley boiler merged into the B&W stack		Department notification
14.6	Install beet cleaning system	Two years after issuance of Tier II Operating Permit No. 027-00010	Submit PTC application for steam dryer project
			Department notification
14.7	Install transformer evaporator and mill heaters	Three years after issuance of Tier II Operating Permit No. 027-00010	Department notification
14.8	Order and fabricate steam dryer	Four years after issuance of Tier II Operating Permit No. 027-00010	Department notification
14.9	Installation and operation of steam dryer system	Five years after issuance of Tier II Operating Permit No. 027-00010	Department notification
	Closure of the Center and North dryers		Tier II operating permit application

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Permit Conditions	Milestone	Deadline	Documentation/Reporting
14.13	Submit complete information to address the applicable PTC requirements in IDAPA 58.01.01.200 through 228 for those sources for which the permittee may have been required to, but did not obtain, a PTC	180 days after issuance of the Tier I operating permit	Completeness letter from the Department
14.14	Submit supplemental application information to address the applicable PTC requirements for any additional sources identified	Within 30 days of a request in writing by the Department during processing of the facility-wide permit	Completeness letter from the Department
14.17	Submit a request to modify the Tier I operating permit	30 days after the facility-wide permit application is found complete	Completeness letter from the Department
14.18	Submit quarterly progress reports	January 1, April 1, July 1, and October 1 of each year	

- 14.2 Upon issuance of Tier II Operating Permit No. 027-00010 emissions of PM₁₀ and CO from the South, Center, and North dryers and the No. 1, 2, 3, 4, and 5 pellet mills shall not exceed any corresponding emissions rate limits listed in Table 14.2.

Table 14.2 EMISSIONS LIMITS FOR DRYES AND PELLET MILLS

Source Description / Unit Number	PM ₁₀		CO	
	lb/hr	T/yr	lb/hr	T/yr
South pulp dryer / S-D1	37.4	164.0	146.0	640.0
Center pulp dryer / S-D2	37.4	164.0	95.5	418.2
North pulp dryer / S-D3	28.4	124.4	63.9	279.9
Pellet mill No. 1 / S-D4	1.8	7.8		
Pellet mill No. 2 / S-D5	2.7	11.8		
Pellet mill No. 3 / S-D6	2.7	11.8		
Pellet mill No. 4 / S-D7	2.7	11.8		
Pellet mill No. 5 / S-D8	1.8	7.8		

- 14.2.1 Upon completion of Permit Condition 14.5.1, PM₁₀ emissions from the pellet mills shall comply with Permit Condition 6.3. Upon completion of Permit Conditions 14.9.1 and 14.9.2, emissions of PM₁₀ and CO from the South dryer shall comply with Permit Condition 5.3.
[IDAPA 58.01.01.322.01, 11, 3/19/99; Tier II Permit No. 027-00010, 9/30/02]

- 14.3 Within 60 days of the issuance of Tier II Operating Permit No. 027-00010 TASCO shall comply with the following permit conditions:

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- 14.3.1 The provisions of Permit Conditions 2.1 through 2.4 and shall be fully implemented, including all required monitoring and recording.
- 14.3.2 When the requirements of Permit Condition 14.3.1 have been fulfilled, the permittee shall notify the Department in writing. The permittee shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 14.3 as expediently as reasonably possible.
[IDAPA 58.01.01.322.08, 11, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 14.4 Within 120 days of issuance of Tier II Operating Permit No. 027-00010 and before the end of the 2002/2003 beet campaign, the permittee shall conduct performance tests as required in Permit Conditions 14.4.1 and 14.4.2
- 14.4.1 Performance tests shall be conducted on the South, Center and North dryers to demonstrate compliance with the emissions limits for PM₁₀ in Permit Condition 14.2. The dryer shall be tested with coal as the exclusive fuel. The permittee shall monitor and record the throughput of the dryer, coal feed rate in tons per hour, and scrubber differential pressure of the scrubbers during each test. Throughput of the dryer shall be represented by the sum of the masses of coal, wet pulp, and CSB fed to the dryer. The permittee shall collect a representative sample of recirculated water from the scrubber during each test. The concentration of TDS in the sample water shall be analyzed, recorded, and expressed in milligrams of solids per liter of water.
- 14.4.2 If the PM₁₀ emissions rate measured in the performance test is less than or equal to 75% of the PM₁₀ emissions standard in Permit Condition 14.2, no further testing shall be required. If the PM₁₀ emissions rate measured during the performance test is greater than 75%, but less than or equal to 90% of the PM₁₀ emissions standard in Permit Condition 14.2, a second test shall be required in the third year of the permit term. If the PM₁₀ emissions rate measured during the performance test is greater than 90% of the PM₁₀ emissions standard in Permit Condition 14.2, the permittee shall conduct a compliance test annually.
- 14.4.3 Within 30 days following the date on which the performance test required by this permit condition is concluded, the permittee shall submit to the Department a report for the respective test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.
[IDAPA 58.01.01.322.08, 11, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 14.5 Within one year of the issuance of Tier II Operating Permit No. 027-00010 TASC0 shall comply with the following permit conditions:
- 14.5.1 The provisions of Permit Conditions 6.5 and 6.8 shall be fully implemented.
- 14.5.2 All flue gases from the Riley boiler shall be exhausted to the atmosphere through the B&W boilers' stack (Unit No. P-B1/2) after passing through the existing baghouse (Unit No. A-B3).
- 14.5.3 When the requirements of Permit Conditions 14.5.1 and 14.5.2 have been fulfilled, the permittee shall notify the Department in writing. The notification provided with respect to Permit Condition 14.5.1 shall include all relevant technical specifications and data from the baghouse manufacturer. The notification provided with respect to Permit Condition 14.5.2 shall include a schematic diagram of the final exhaust system routing for the B&W No. 1, B&W No. 2, and Riley boilers. The permittee shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 14.5 as expediently as reasonably possible.

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[IDAPA 58.01.01.322.08, 11, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]

- 14.6. Within two years of the issuance of Tier II Operating Permit No. 027-00010 TASCO shall comply with the following permit conditions:
- 14.6.1 In accordance with IDAPA 58.01.01.201, the permittee shall submit a PTC application for the proposed steam dryer system (intended to replace the Center and North dryers). The application shall include technical parameters, including, but not limited to, the following: operational requirements and rated capacity of the steam dryer system, schematic diagrams of the steam dryer system, and all information needed to calculate and/or verify emissions rates associated with the steam dryer system and affected units.
- 14.6.2 Upon Department issuance of a PTC or exemption determination of the PTC application required by Permit Condition 14.6.1, the permittee shall install the beet cleaning system required for operation of the steam dryer system.
- 14.6.3 When the requirements of Permit Condition 14.6.2 have been fulfilled, the permittee shall notify the Department in writing. The permittee shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 14.6 as expediently as reasonably possible.
[IDAPA 58.01.01.322.08, 11, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 14.7 Within three years of the issuance of Tier II Operating Permit No. 027-00010 TASCO shall comply with the following permit conditions:
- 14.7.1 Upon Department issuance of a PTC or exemption determination of the PTC application required by Permit Condition 14.6.1, the permittee shall install the transformer evaporator and mill heaters required for operation of the steam dryer system.
- 14.7.2 When the requirements of Permit Condition 14.7.1 have been fulfilled, the permittee shall notify the Department in writing. The permittee shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 14.7 as expediently as reasonably possible.
[IDAPA 58.01.01.322.08, 11, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 14.8 Within four years of the issuance of Tier II Operating Permit No. 027-00010 TASCO shall comply with the following permit conditions:
- 14.8.1 Upon Department issuance of a PTC or exemption determination of the PTC application required by Permit Condition 14.6.1, the permittee shall order and fabricate the steam dryer system.
- 14.8.2 When the requirements of Permit Condition 14.8.1 have been fulfilled, the permittee shall notify the Department in writing. The permittee shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 14.8 as expediently as reasonably possible.
[IDAPA 58.01.01.322.08, 11, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 14.9 Within five years of the issuance of Tier II Operating Permit No. 027-00010 TASCO shall comply with the following permit conditions:
- 14.9.1 Pending Department issuance of a PTC or exemption determination of the PTC application required by Permit Condition 14.6.1, the permittee shall install and operate the steam dryer system.
- 14.9.2 The Center and North dryers shall permanently cease operation at the TASCO facility located in Nampa,

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- 14.9.3 When the requirements of Permit Conditions 14.9.1 and 14.9.2 have been fulfilled, the permittee shall notify the Department in writing. The permittee shall notify the Department in writing of any delay or failure to meet the requirements of Permit Conditions 14.9 as expediently as reasonably possible.
[IDAPA 58.01.01.322.08, 11, 5/1/94; Tier II Permit No. 027-00010, 9/30/02]
- 14.10 The permittee shall submit both a Facility-wide Tier I and a Tier II operating permit application within 60 days of fulfilling the requirements of Permit Condition 14.9. The permit applications shall, at a minimum, include updated process descriptions, including all changes implements in accordance with Permit Conditions 14.3 through 14.9, updated information obtained by the performance testing requirements of Tier II Operating Permit No. 027-00010, and an updated facility-wide modeling analysis for all criteria pollutants. Thirty days prior to submission of the modeling analysis for the Tier II operating permit application, the permittee shall submit a modeling protocol to the Department for approval.
[IDAPA 58.01.01.313.03, 4/5/00; Tier II Permit No. 027-00010, 9/30/02]
- 14.11 In the event that this Tier I operating permit should expire before the Department issues a renewed Tier I operating permit, or before the requirements of Permit Conditions 14.3 through 14.10 are met by the permittee, TASCO shall continue to comply with all requirements contained in this Tier I operating permit until such time as the Department issues an updated Tier I operating permit for the facility.
[IDAPA 58.01.01.322.15(p), 5/1/94]
- 14.12 The Department identified the following sources as sources that cannot be certified as in compliance because of failure to address IDAPA 58.01.01.200 through 228 prior to construction or modification:
- Thick juice storage tanks Nos. 1-9
 - A side diffuser
 - Drying granulator
 - No. 2 cooling granulator
 - Chromatic separator
 - 2800-KW and 6000-KW generators
- The permittee has the continuing responsibility to submit any supplementary information needed, including information for any other sources, in accordance with IDAPA 58.01.01.315.
[IDAPA 58.01.01.315, 5/1/94]
- 14.13 For each source listed in Permit Condition 14.12, TASCO shall submit all of the applicable information needed to address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through IDAPA 58.01.01.228 for the construction and/or modification of any sources at the facility for which the permittee may have been required to, but did not obtain, a PTC.
[IDAPA 58.01.01.322.10, 4/5/00]
- 14.14 If through the review of the information required under Permit Conditions 14.13, the Department determines that the facility should have obtained a PTC or a PTC modification for any other source or sources at the facility, TASCO shall submit a supplemental application that address the applicable requirements for PTCs within 30 days of receiving written notification from the Department.
[IDAPA 58.01.01.322.10, 4/5/00]

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- 14.15 The submittal deadlines set forth in Permit Conditions 14.13 and 14.14 may be extended if the permittee clearly demonstrates that additional time is needed to collect new data for submittal of complete information. Extension requests, with complete information to justify the request, must be submitted in writing to the Department no later than the midpoint of the milestone timeline. The deadlines may be extended for up to one year through written authorization from the Department.
[IDAPA 58.01.01.322.10, 4/5/00]
- 14.16 Upon receipt of complete information, the Department will modify the facility-wide Tier II operating permit into a single proposed Tier II operating permit and PTC for the facility. The permit will contain all of the terms and conditions necessary to comply with the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 228 and the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410. The permit will clearly identify the origin and basis for each term and condition. The procedures for issuing a PTC under IDAPA 58.01.01.209 shall be followed concurrently with the facility-wide permit in accordance with the procedures for issuing a Tier I permit in IDAPA 58.01.01.360 through 369.
- 14.17 TASCO shall request a modification to their Tier I operating permit within 30 days after the Tier II operating permit supplemental information and PTC information is determined complete by the Department. The Tier I operating permit shall be modified to incorporate all applicable requirements of the facility-wide Tier II operating permit and PTC and shall be issued concurrently with the facility-wide permit in accordance with the procedures for issuing a Tier I permit in IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.10, 4/5/00]
- 14.18 Until such time that all of the provisions of this compliance schedule are completed, TASCO shall submit a progress report each calendar quarter to the Department stating when each of the milestones and compliance with each condition in the compliance schedule were or will be achieved, and an explanation of why any dates were not or will not be met and a detailed description of any preventative or corrective measures undertaken by the permittee.
[IDAPA 58.01.01.322.10, 4/5/00]
- 14.19 This schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.
[IDAPA 58.01.01.322.10, 4/5/00]

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15. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99;
40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(iii)]
5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

6. This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

7. The permittee shall furnish all information requested by the Department, within a reasonable time, that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
[Idaho Code §39-108; IDAPA 58.01.01.122, 5/1/94; IDAPA 58.01.01.322.15.f, 4/5/00;
40 CFR 70.6(a)(6)(v)]

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Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

8. Upon request, the permittee shall furnish to the Department copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223; IDAPA 58.01.01.322.15.i, 380-386, 3/19/99; 40 CFR 70.4(b)(12), (14) and (15), and 70.7(d) and (e)]

11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. Section 502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 3.19.99; IDAPA 58.01.01.209.05, 5/1/94; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

12. Unless specifically identified as a "State-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's PTE, are enforceable: (i) by the Department in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]

13. Provisions specifically identified as a "State-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal CAA or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

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Inspection and Entry

14. Upon presentation of credentials, the permittee shall allow the Department or an authorized representative of the Department to do the following:
- a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
- [Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]**

New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.
- [IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]**

Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to the Department in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.
- [IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]**

Certification

17. All documents submitted to the Department shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.
- [IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]**

Renewal

18. a. The owner or operator of a Tier I source shall submit an application to the Department for a renewal of this permit at least 6 months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application 9 months prior to the date of expiration.
- [IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]**
- b. If a timely and complete application for a Tier I operating permit renewal is submitted, but the

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Department fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
 - i. The Department has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
 - b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a PTC), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
 - c. Nothing in this permit shall alter or affect the following:
 - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of the Department to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

**[Idaho Code §39-108 and 112; IDAPA 58.01.01.122; 322.15.m, 325, 5/1/94;
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]**

Compliance Schedule and Progress Reports

- 20.
- a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
 - b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
 - c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely

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basis.

- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.
[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 10, 5/1/94; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to the Department and the EPA as follows:
- a. Compliance certifications for all emissions units shall be submitted annually beginning 12 months from the permit issuance date, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by the Department;
 - b. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
 - c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
 - i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
 - iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 21.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
 - iv. Such other facts as the Department may require to determine the compliance status of the source.

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- d. All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]

False Statements

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months starting six months from the date of permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

27. In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 3/19/99; 40 CFR 70.6(g)]